

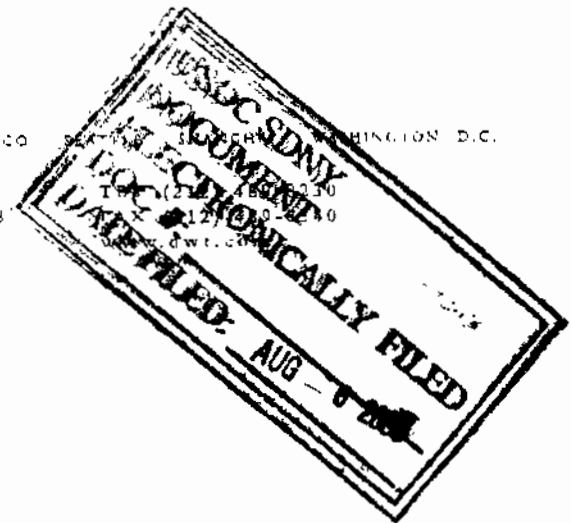
LAWYERS



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August 5, 2008

VIA FACSIMILE  
(212) 805-6737

Hon. George B. Daniels  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 630  
New York, NY 10007

Re: *Muinos v. Thomas Nelson, Inc.*  
Index No 00271/08

08cv271

Dear Judge Daniels:

We represent the defendant in the above-referenced matter. We write on behalf of all parties to request an adjournment of the pretrial conference scheduled for August 6, 2008 as well as an adjournment of certain other dates in the Civil Case Management Plan and Scheduling Order for this case.

Per Your Honor's rules, the parties wish to extend discovery by 60 days in order to allow for additional document collection and out-of-state depositions. Accordingly, the parties do not feel that a pretrial conference would be productive at this time, and request that it be adjourned to October 8, 2008.

The parties request the adjournments of the dates listed in the Civil Case Management Plan and Scheduling Order as follows:

- All **discovery** shall be commenced in time to be completed by **October 6, 2008**.
- **Dispositive motions** are to be served by **December 1, 2008**.
- Final **pretrial conference** will be held on **January 7, 2009** (or four (4) weeks from the decision on any dispositive motion)

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- The **Joint Pretrial Order** shall be filed no later than **December 8, 2008**.
- The parties shall be **ready for trial** on 48 hours notice on or after **January 7, 2009**.
- The **Next Case Management Conference** will be held on **October 8, 2008 at 9:30 a.m.**

The parties have consulted and request all of the above dates jointly.

Thank you very much for your consideration.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Kevan Choset'.

Kevan Choset

Enclosures

cc: Andrew Vitrano, Esq

IT IS SO ORDERED

This 6<sup>th</sup> day of August, 2008

A handwritten signature in cursive script, appearing to read 'George B. Daniels'.

Hon. George B. Daniels  
U.S.D.J.  
**HON. GEORGE B. DANIELS**